

U.S. DISTRICT COURT
 EASTERN DISTRICT OF LOUISIANA
 FILED 3-7-2018
 WILLIAM W. BLEVINS
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UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 18-37
 v. * SECTION: "B"
 MARCIA DENISE JORDAN *
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 * * *

FACTUAL BASIS

The defendant, **MARCIA DENISE JORDAN**, has agreed to plead guilty to the one-count Bill of Information charging her with attempting to evade or defeat a tax, in violation of 26 U.S.C. § 7201.

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant:

A witness would testify that at all times material herein, the defendant, **JORDAN** was living within the Eastern District of Louisiana. The same witness would testify that during the 2011 calendar year, **JORDAN** worked for a law firm, located in New Orleans, Louisiana, which is also within the jurisdiction of the Eastern District of Louisiana. Witnesses and admissible records, including financial records, would be introduced to prove that, during calendar year 2011, **JORDAN** received adjusted gross income of approximately \$503,365 and, taking into

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account applicable deductions, had taxable income of approximately \$493,266. Upon this sum, evidence would be introduced to prove that there was a tax due and owing to the United States of approximately \$157,579. Evidence, including admissible documents and testimony, would be admitted to prove that the defendant, **JORDAN**, did willfully attempt to evade and defeat the income tax due and owing by her to the United States of America for the 2011 tax year, by failing to file an income tax return on or before April 17, 2012, and by filing and causing to be filed, and signing and causing to be signed, a false and fraudulent IRS Form 4868 (Application for Automatic Extension of Time to File United States Individual Income Tax Return), which falsely estimated her total tax liability to be \$0 and also falsely indicated that she made \$10,000 in payments to the Internal Revenue Service for calendar year 2011. Evidence would further be admitted to show that the Internal Revenue Service is an agency of the United States Department of Treasury.

Witnesses and records would also prove that during calendar year 2011, instead of paying her tax due and owing to the United States, she paid for personal expenses directly from the \$493,266 that she received in taxable income.

Financial records, including bank records of the defendant, tax records, including historical returns and other IRS forms that were previously filled out and signed by **JORDAN**, would be introduced to prove the facts as set forth above, as well as her knowledge of the duty to file taxes. Finally, testimonial evidence, including testimony from representatives of the Internal

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Revenue Service, as well as special agents of the Internal Revenue Service, would also be admitted to prove the facts set forth above, including the calculations of tax loss and tax amounts due and owing by **JORDAN** for the 2011 tax year.

APPROVED AND AGREED TO:




JON MAESTRI
Assistant United States Attorney

3-7-18

Date

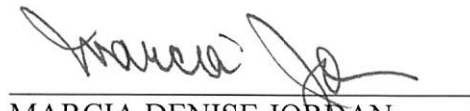
GRACE ALBINSON
Trial Attorney, Tax Division



BRIAN J. CAPITELLI
Attorney for Defendant JORDAN

3/7/18

Date



MARCIA DENISE JORDAN
Defendant

3/7/18

Date